



# United States Department of Justice

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January 19, 2017

(Letter 2)

Sent by Email

All Defense Counsel  
(Distribution list below)

Re: *United States v. Hazelwood, et al.*, Docket No. 3:16-CR-20  
1/09/2017-6/16/2017 Rolling Production Period  
Availability of LogicForce Xera Platform for Rolling Production Period material

Dear Counsel:

Pursuant to the Court's scheduling order (R. 69), the United States has begun its rolling production of material to be produced to defendants during the period January 9, 2017, through June 16, 2017 (the "Rolling Production Period").

This letter relates to the availability of LogicForce's Xera review platform for your use with respect to the material produced by the government as part of the Rolling Production Period. The government has requested and has been advised by Neal & Harwell that Xera is available for your use with respect to that material. Accordingly, Xera is available to you to review the material produced by the government during the Rolling Production Period as long as the requirements of the agreed protective order are followed.

1. Rolling production period material that was provided to the government through Neal & Harwell, counsel for Pilot Travel Centers, LLC

With respect to material that is designated as part of the government's Rolling Production Period and that the government has been provided through Neal & Harwell, counsel for Pilot Travel Centers LLC, Neal & Harwell has advised the government that the following procedure may be used. Upon LogicForce's being informed by defense counsel of a new Rolling Production set by the government, LogicForce will add a field in Xera for the identified Rolling Production Bates range, and will provide a new viewer tab that will allow the user to see those Bates-labeled documents. At that time, LogicForce will also folder each Rolling Production set in Xera for quick reference. Should you have any specific questions about this process and/or how to use Xera for this purpose, please contact LogicForce.

All counsel of record

*U.S. v. Hazelwood, et al.*, Docket No. 3:16-CR-20

January 19, 2017

2. Material that was not provided to the government through Neal & Harwell

While the government has no objection to your use of Xera to review the Rolling Production material (including material that was not provided to the government through Neal & Harwell), we think that a brief observation is worthwhile related to Rolling Production material that will be produced by the government in the future that was not provided to the government through Neal & Harwell, such as, agency memoranda, consensual recording designations, and grand jury material. Should you choose to use Xera as a review tool for that material, care will need to be taken to ensure that LogicForce limits access to any such material strictly to defense counsel personnel as defined by the agreed protective order – which of course would not include Neal & Harwell. In other words, based on our understanding of the agreed protective order, any such material should be forwarded directly to LogicForce. Neal & Harwell should not be used as a conduit for the loading of any such material onto Xera.

Sincerely,

NANCY STALLARD HARR  
UNITED STATES ATTORNEY

*s/Trey Hamilton*

By:

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